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4 Counsel for Defendant CRECY
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14
15 WARREN CRECY,
16 Defendant.

)
) No. CR 06-00222 SBA

)
) STIPULATION AND
) ORDER CONTINUING FILING DATE
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17 IT IS HEREBY STIPULATED, by and between the parties to this action, that the date for
18 filing any additional sentencing memorandums in this case, currently set for Tuesday, June 12, 2007,
19 may be continued one week to Tuesday, June 19, 2007. The reason for the request is that the
20 amended Presentence Report ("PSR") was just released on Tuesday, June 5, 2007. The amended
21 PSR contains very specific additional allegations from Mr. Crecy's sister detailing past sexual abuse.
22 Defense counsel needs time to meet with Mr. Crecy and review the specific allegations in the
23 amended PSR and determine how to respond in its amended sentencing memorandum. Because of
24 scheduling conflicts at the jail and as well as conflicts with defense counsel's schedule, counsel is
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not able to even meet with Mr. Crecy, who is housed in Santa Rita Jail in Dublin, California, to review the amended PSR until the afternoon of Monday, June 11, 2007 which is the day before the supplemental sentencing memorandum is due. One additional week is needed after meeting with Mr. Crecy to file a supplemental sentencing memorandum. Should the Court allow counsel to file a supplemental sentencing memorandum by Tuesday, June 19, 2007, it would still allow the Court two weeks to review the memorandums prior to sentencing on July 3, 2007. There is no need to exclude time because the client already has pled guilty.

DATED: June 8, 2007

JOYCE LEAVITT /S/
Assistant Federal Public Defender

DATED: June 8, 2007

MICHELLE MORGAN-KELLY /S/
Assistant United States Attorney

I hereby attest that I have on file all holograph signatures indicated by a "conformed" signature ("/S/") within this efiled document.

ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the date for filing any additional sentencing memorandums in this case, currently set for Tuesday, June 12, 2007, may be continued one week to Tuesday, June 19, 2007. Sentencing shall remain on Tuesday, July 3, 2007, at 10:00 a.m.

SO ORDERED.

DATED: 6/12/07



HONORABLE SAUNDRA BROWN ARMSTRONG
United States District Judge